

UNIT - 9 102

JAR

**MEMORANDUM**

---

**CH2M HILL**

**PREPARED FOR:** Sylvia Burges/EPA Region 10

**DATE:** July 5, 1996

**COPIES TO:** Edwin Liu/RP  
Paul Nemanic/RP  
Ed Petrie/RP  
Fred Ellerbusch/RP  
Rich Torrito/RP  
John Abrams/RP  
Tom McLaughlin/RP  
Mike Shatynski/RP  
Betsy Carlton/RP  
Buzz Rahier/RP  
Sue Hays/Hays Consulting  
Chuck Blumenfeld/Bogle & Gates  
Doug Holsten/CH2M HILL  
Howard Steeley/Ecology  
Theresa Michelsen/Ecology  
Pam Elardo/Ecology  
Peter Wright/Monsanto  
Rene Fuentes/EPA

## **TECHNICAL STATUS REPORT**

**CH2M HILL**

**PREPARED FOR:** Sylvia Burges/EPA Region 10  
**COPIES TO:** Byung Maeng/Ecology  
**PREPARED BY:** Liz Luecker/CH2M HILL  
**DATE:** July 3, 1996  
**SUBJECT:** Rhône-Poulenc Monthly Status Report  
**SITE NAME AND LOCATION:** Rhône-Poulenc Inc./Seattle Plant  
Tukwila, WA  
**REPORTING PERIOD:** June 1 through June 30, 1996  
**PROJECT:** 106063.P1

Following is CH2M HILL's technical status report summary for the RCRA Corrective Action Project at Rhône-Poulenc's (RP) Seattle Plant. This status report summarizes activities implemented and planned for this Corrective Action project and is intended to be transmitted to U.S. EPA Region 10 in fulfillment of the monthly progress reports required in Consent Order No. 1091-11-20-3008(h).

### **Progress Made This Reporting Period**

#### ***Task P1-Project Management***

The EPA status report was faxed to EPA on June 10 and mailed to the distribution on the same day.

On June 10, Sue Hays/Hays Consulting received a call from Byung Maeng/Ecology. He said that his copy of the 1986 Dames and Moore Site Screening Investigation - Final Report was missing four pages. Sue provided copies of these pages to him. Two of these pages were summaries of groundwater and soil analytical data, and two pages were narrative concerning analytical results.

#### ***Task A3-Interim Measures***

##### **Report.**

A report documenting the compressor pad excavation, the PCB ditch excavation, sewer cleaning, and disposal of associated waste streams is currently being developed by Terra Nova Environmental Sciences and CH2M HILL.

June 1996 Status Report  
Rhône-Poulenc Inc  
Seattle Plant

#### LNAPL.

RP monitored the wells for LNAPL on June 28. The wells monitored for LNAPL were: H10, MW-12, H11, DM-7, H9, G3, B6, MW-14, MW-15, MW-17, MW-18, MW-19, and MW-20. Well DM-7 was not accessible at this time because a container belonging to Northwest Container was stored on top of it. No well monitored contained a measurable amount of LNAPL. The samples from wells H10 and H11 had a film. The sample from well MW-12 had a sheen with oily globules. The remaining wells surveyed did not contain LNAPL. Information on the LNAPL thicknesses is attached.

#### ***Task A8-Round 3 Technical Memorandum***

RP talked to EPA 10 on June 20 regarding the intertidal sediment sampling proposed in the Round 3 Technical Memorandum. EPA stated that Ecology will require other samples in addition to those mentioned in the May 21, 1996, sampling plan submitted to EPA and Ecology in the Round 3 Technical Memorandum Response to Comments. RP and EPA agreed that the Round 3 Technical Memorandum would not be finalized until the sediment sampling is completed and the data analyzed.

#### ***Task S1-Miscellaneous Support***

##### Storm Water.

Most of the storm water in the open-top 800,000-gallon storm water tank was pumped out in June.

##### Rinsate from PCB-contaminated Tanks.

The 8 drums of rinsate from cleaning the PCB-contaminated wash water tanks and some of the water from the drums of sludge from cleaning the PCB-contaminated wash water tanks were transferred to the mobile holding tank; the water was recirculated through one-micron filters. The water was sampled and the sample sent to Sound Analytical on June 18. Results received on June 20 indicated that the sample contained 0.21 mg/l copper and 3.4 µg/l Arochlor 1254. This water (approximately 500 gallons) was discharged to Metro on June 28.

#### ***Task S3-Laboratories***

On June 21, CH2M HILL contacted Maxwell S-Cubed Laboratory to coordinate obtaining sample bottles for the intertidal sediment sampling scheduled for July 1 and 2. At this time, CH2M HILL was informed that the laboratory had been bought and was in the process of merging with another laboratory. This concerned the project team because of prior problems on this project with data quality and data timeliness after laboratory mergers. After discussions among the laboratory, CH2M HILL, and RP, a decision was made on June 27 not to send the samples to Maxwell S-Cubed Laboratory. Instead, the

June 1996 Status Report  
Rhône-Poulenc Inc  
Seattle Plant

sediment samples will be sent to ARI, another laboratory with prior Puget Sound Estuary Program (PSEP) protocols experience who also bid on the project in December. EPA was notified of this decision on July 1.

### ***Task S4-Intertidal Sediment Sampling***

On June 20, RP and CH2M HILL talked to or left voicemails for Teresa Michelsen/Ecology regarding the need for additional intertidal sediment sample locations. Ecology agreed that outfalls 2 and 3 could be combined (3 samples would be needed between the 2 outfalls) and that one historical sample near each of outfalls 6 and 7 could be used for the required cluster of 3 samples. On June 26, CH2M HILL faxed copies of the revised Intertidal Sediment Sampling Plan to Sylvia Burges/EPA 10 and Teresa Michelsen/Ecology.

### **Deliverables Submitted**

The May Progress Report was submitted to U.S. EPA on June 10.

On June 26, CH2M HILL faxed copies of the revised Intertidal Sediment Sampling Plan to Sylvia Burges/EPA 10 and Teresa Michelsen/Ecology.

### **Progress Planned For Next Reporting Period**

#### ***Task A2-Applicable Regulations and Permits***

##### **Leasing Arrangements.**

The PCB ditch area will be paved by Lakeridge Paving once excavation of contaminated soils is complete and EPA approves the Interim Measures report.

The soil and shrubbery Northwest Container Services' contractor removed from the area near the Facility's North Road, near the entrance (in RFI investigation Areas BG and A3) and from south of the laboratory building (in Area 3) is still being stockpiled on site. The soil was placed in two dirt piles (approximately 10 cubic yards) located at the northwest corner of the laboratory building and a third pile located southwest of the laboratory building (approximately 100 cubic yards). Northwest Container will dispose of this soil as non-hazardous based on past sampling data.

##### **Storm Water.**

The storm water remaining in the open-top 800,000 gallon tank will be pumped out in July. The sediments in the tank will then be allowed to dry. RP plans to have a contractor remove the sediments from the tank in August/September.

June 1996 Status Report  
Rhône-Poulenc Inc  
Seattle Plant

### ***Task A3-Interim Measures***

#### **LNAPL.**

Continue to monitor LNAPL thicknesses in selected monitoring wells monthly.

### ***Task S1-Miscellaneous Field Support***

#### **Drum Disposal.**

A total of 21 drums of wastes are on site. The wastes include:

- 10 full drums and 2 partial drums (1/4" and 8") of sludge from cleaning the PCB-contaminated wash water tanks
- 5 drums of sludge from cleaning the non-PCB-contaminated wash water tanks
- 2 drums of used activated carbon
- 2 drums of filters

Approximately 250 gallons of standing water remain in the PCB-contaminated sludge drums. This water will be filtered through one-micron filters and discharged to Metro, if the water meets Metro's discharge limits.

The various sludges will be solidified and landfilled at the Waste Management, Inc., hazardous waste facility in Arlington, OR. Testing has shown that the sludges contain less than 50 ppm PCBs.

The activated carbon drums will be sent offsite for incineration.

#### **API Separator Clean Out.**

The water layer in the API Separator will be pumped off, filtered, analyzed for copper, and discharged to Metro; this effort is expected to happen in July. After the water is discharged, CEcon will clean the separator, and the combined upper emulsion and lower sludge layers will be solidified for landfilling at the Waste Management, Inc., hazardous waste facility in Arlington, OR.

#### **Outfall 4 Wash Water in Aluminum Tank.**

Approximately 1,000 gallons of outfall 4 wash water and sludge are in the aluminum tank. The water in the aluminum tank will be filtered on site through one-micron filters and discharged to Metro, if possible. Filtration of the water is expected to occur during July, so that the water can be discharged to Metro by August. Sludge in the tank will be removed, solidified, and landfilled at the Waste Management, Inc., hazardous waste facility in Arlington, OR.

*rhône-p/MSR/06-96EPA*

RHONE POULENC - MARGINAL WAY FACILITY MONTHLY LNAPL SURVEY LOG Floating Product Layer Thickness in Feet																																								
Date Sampled	H10	H1	MW12	H11	DM7	H9	H6	DM2A	DM2B	DM8	A9	DM3A	DM3B	A2	A4	DM4	B4	B2	DM5	B1A	B1B	C1	DM6	B5	G3	G1	B6	MW13	MW14	MW15	MW16	MW17	MW18	MW19	MW20	DM1A	DM1B	E3		
6/7/94	0		0																																					
6/8/94	0		0																																					
6/17/94	Film	0	0.007	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0													
8/4/94	Film	Sheen	Sheen	Film	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0													
9/8/94	Film	0	Film	0.01	0	Sheen	Sheen	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0.021	0.005	0	0	0.01	0				
10/6/94	0	0	Sheen	0.01	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0.021	0				
11/3/94	0	0	0.005	0.005	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0.01	0	0	0		0				
12/5/94	0	0	0	Sheen	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0					
1/11/95	0.26 <sup>a</sup>	Sheen	Sheen	0.04 <sup>d</sup>	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0.01 <sup>a</sup>	0	0	0	0	0	0			
2/17/95	2.01	0	0.16	Sheen	0	0	0	0	0	0	NA	0	0	0	0	0	0	0	0 <sup>b</sup>	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
3/23/95	0.01										0	0	0	0	0 <sup>c</sup>				0	0	0	0													0	0	Sheen <sup>c</sup>			
3/27/95		0	Sheen	0	0	0	0	0	0	0						0	0	0	0				0		0	0	0	0	0	0	0	0	0	0	0	0	0	0		
3/28/95																			0																					
4/27/95	0.063	0	Film <sup>d</sup>	0		0				0	0	0	0	NA	0		0	0	0	0	0	0	0	0	0	0	0	0	0	0			0	0.063 <sup>e</sup>	Sheen	0				
4/28/95					0		0	0	0							0														0	0									
5/31/95	0.01	0	Film	0	0	0	0	0	0	0	0	0	0	NA	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0		
6/30/95	Sheen <sup>d</sup>	0	Film	NA	0	0	0	0	0	0	0	0	0	NA	0	0	0	0	0	0	0	0	0	0	0	0	0	0	NA	Sheen	Sheen	0	0	0	0	0	0	0		
7/28/95																	0		0			0	0	0				0	0						0					
7/29/95	Sheen	0	Sheen	NA	0	0	0	0	0	0	0	0	0	NA	0	NA		0	0	0	NA			0	0	0	0	0	0	0	0	0	0	0	0	0	0	0		
8/26/95	Sheen	0	Sheen	0	0	0	0	0	0	0	0	0	0	NA	0	NA	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0		
9/29/95	0.03	0			0	0	0	0	0	0	0	0	0	0	0	0		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0		
10/4/95			Sheen <sup>d</sup>	<sup>d</sup>													0										0													
10/30/95	0.03	0	<sup>d</sup>	Film	0	0						0	0	0	0	0	0	0	NA	NA		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0 <sup>f</sup>	
10/31/95							0	Sheen	Sheen	0	0							NA	NA	0						NA														
11/30/95	Film	0	Sheen	Film	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0		
12/31/95	0.2	0	Film	Sheen	NA	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0		
1/3/96	1.17		<sup>d</sup>	Sheen	0	0																				0		NA		0	0		0	0	0	0	0	0		
2/27/96	Film <sup>g</sup>		0	Sheen	0	0																				0		0		0										
3/31/96	Film		Film	Film	0	0																				0		NA		0	0	0	0	0.09	0	0 <sup>f</sup>				
4/29/96	Film		<sup>d</sup>	Sheen	0	0																				0		NA		0	0		0	0	0	0	0	0		
5/31/96	Film		<sup>d</sup>	Sheen <sup>h</sup>	0	0																				0		NA		0	0		0	0	0	0	0	0		
6/28/96	Film		Sheen <sup>d</sup>	Film	NA	0																				0		0		0	0		0	0	0	0	0	0		
<sup>a</sup> Solinst Model 121 oil/water interface probe. After 1/11/95, all wells were monitored using this probe when significant LNAPL is present. <sup>b</sup> No sheen noted when measurement device was placed in clean water, but water turned light brown after probing. <sup>c</sup> Orange/rust colored residue on probe. <sup>d</sup> Globules. <sup>e</sup> Dark Phase. <sup>f</sup> Odor of decay. <sup>g</sup> 1000 mL of LNAPL were bailed from H10 at 10:45 am <sup>h</sup> Slight sheen NA = Not accessible.																																								